

United States District Court
 For the
 Middle District of Pennsylvania

FILED
 SCRANTON

AUG 01 2011

MARY E. DANCREA, CLERK
 Per [Signature]
 DEPUTY CLERK

Norman M. Shelton
 Plaintiff

"vs"

Case No. Hill-CV-00368 W.J.R.

defendants.

Warden Bledsoe et al

Affidavit in support of the plaintiff's Motion for the
 Appointment of Counsel

Norman M. Shelton, Do declare under penalty of perjury
 states the following to be true and correct to the very best of my
 knowledge and understanding.

1. I am the plaintiff in the above entitled case. I
 make this affidavit in support of plaintiff's motion for appointment of
 counsel.

2. The complaint in this case alleges that the plaintiff
 was subjected to being assaulted by two different gang
 members and the misuse of force by several correctional officers
 some of whom actively beat and kicked me and other of whom
 watched and failed to intervene. It alleges that supervisory
 officials were aware of the violent propensities of some of
 the officers and are liable for failing to take action to control
 them. The Plaintiff was subsequently denied due process in a dis-
 ciplinary hearing done by chambers, and his appeal was denied
 by the warden. He was denied ordered medical care by the
 prison medical administrator and the deputy warden for administ-
 ration.

3. This is a complex case because it contains several
 different legal claims, with each claim involving a defendant set
 of defendants.

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4.) The case involves medical issues that may require expert testimony. plaintiff has demanded a jury trial.

5.) The case will require discovery of documents and deposition of a number of witness.

6.) the testimony will be in sharp conflict, since the plaintiff alleges that the defendants assaulted him, while the defendants fabricated a lie disciplinary reports asserted that he assaulted them.

7.) The Plaintiff has only a high school education and has no legal education. The plaintiff is serving a sentence in punitive segregation, for this reason he has very limited access, to legal materials and has no ability to investigate the facts of the case, for example, by locating interviewing the other inmates who were eyewitness to Plaintiff's beating. As set forth in the memorandum of Law submitted with this motion, these facts, along with the legal merit of the Plaintiff's claims support the appointment of counsel to represent the plaintiff.

Wherefore, the Plaintiff's motion for the appointment of counsel should be granted,

Submitted,

Norman W. Shelton #45969066

C.S.P. Lewisburg

P.O. Box 1005

Lewisburg, Pa. 17837

dated, 7/26/11